

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

BEATRICE WILLIS, )  
                        )  
                        )  
                        Plaintiff, )  
                        )  
                        )  
v.                     ) CIVIL ACTION NO. 03-CV-05-1019-W  
                        )  
                        )  
SEARS, ROEBUCK & CO., )  
                        )  
                        )  
                        Defendant. )

**JOINT MOTION TO EXTEND DEADLINE TO FILE JOINT  
STIPULATION OF DISMISSAL**

The plaintiff, Beatrice Willis, and the defendant, Sears Roebuck & Co., move this Court to extend the deadline for filing a joint stipulation of dismissal until Friday, May 4, 2007, rather than Monday, April 23, 2007. As grounds for this Motion, the parties state as follows:

1. Plaintiff's counsel has been in trial this week and the parties are in the process of finalizing and executing the settlement papers along with the joint stipulation of dismissal.
2. The requested extension will not prejudice either party.
3. The parties have jointly agreed to this motion, and plaintiff's counsel has given the undersigned the authority to represent to the Court that he joins with defendant's counsel in filing this motion. The undersigned is signing on behalf of both parties in an effort to expedite the filing and consideration of this motion.

Wherefore, premises considered, the parties respectfully request that this Court grant this Motion and extend the deadline for filing a joint stipulation of dismissal until Friday, May 4, 2007.

Respectfully submitted,

/s/*Mac B. Greaves*

Mac B. Greaves (GRE007)  
Mieke A. Hemstreet (HEM007)  
Attorneys for Defendant

SEARS, ROEBUCK AND CO.

OF COUNSEL:

BURR & FORMAN LLP  
3100 Wachovia Tower  
420 North 20th Street  
Birmingham, Alabama 35203  
Telephone: (205) 251-3000  
Facsimile: (205) 458-5100

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Defendant has been served on the following by directing same to his office address through first-class, United States mail, postage prepaid, on this the 27th day of April, 2007:

T. Robin McIntyre  
2101 Executive Park Drive  
Opelika, AL 36801

/s/ **Mac B. Greaves**

OF COUNSEL